Virginia Title V Operating Permit

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Sam Moore Furniture Industries, Inc.
Facility Name: Sam Moore Furniture Industries, Inc.
Facility Location: 1556 Dawn Drive
Bedford, VA 24523
Registration No.: 30072
AIRS Number: 019-0006
Permit Number: VA-30072

March 1, 2002
Effective Date

March 1, 2007
Expiration Date

February 4, 2002
Robert G. Burnley
Director, Department of Environmental Quality

Permit consists of 36 pages.
Permit Conditions 1 to 71.

Sam Moore Furniture Industries, Inc.
Title V Operating Permit Table of Contents

PERMIT CONDITIONS - the regulatory reference and authority for each condition is listed in parentheses ( ) after each condition.

Operate in Accordance with Permit

1. The permitted facility is to be operated in accordance with the terms of this permit. You are also advised that the conditions of the Department=s permits dated December 12, 1973; October 23, 1980; April 25, 1988, amended March 4, 1998; April 19, 1999, amended August 3, 2001, and August 30, 2000 are still valid. This permit is subject to revocation prior to its expiration date if the permittee fails to comply with the terms and conditions of the permit, any applicable federal or state requirements as defined in State Regulation 9 VAC 5 Chapter 80 Article 1 or any provisions of State Regulation 9 VAC 5 Chapter 80 Article 1. Any physical change in, or change in the method of operation of, the stationary source subject to this permit may be subject to State Regulations 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, or 9 VAC 5-80-50 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

   Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

   a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is the potential of, a resulting emissions increase;
   b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
   c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emission cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
   d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
   e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
   f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
   g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and by 9 VAC 5-80-720 B. and C.

   If there is any change made at the permitted facility which requires a new permit or a permit modification under 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, it may be necessary to reopen this permit under 9 VAC 5-80-110 to ensure that applicable requirements continue to be met.
   (9 VAC 5-80-110 M, 9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-190, 9 VAC 5-80-240, 9 VAC 5-80-260.)

2. Equipment to be operated consists of:

Significant Emissions Units

Emission Unit ID	Emission Unit Description	Capacity/ Size	Pollution Control Device (PCD)	PCD ID	Applicable Permit Date
Fuel Burning Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
B001	Iron-Fireman 250 HP oil-fired boiler	9.8 x 10^6 Btu/hr	none	n/a	none
B002	Northfab 300 HP wood/#2 oil-fired boiler	12.6 x 10^6 Btu/hr	Zurn Multicyclone Cyclone (fuel silo) Northfab Fabric filter (fuel silo)	C001 C004 C005	10/23/80
B003	Cleaver Brooks 200 HP #2 oil-fired boiler	8.4 x 10^6 Btu/hr	none	n/a	none
Woodworking Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
W004	Miscellaneous woodworking equipment	Various	Carter-day Fabric filter Northfab Fabric filter	C002 C003 C023	12/12/73 4/25/88 amended 3/04/98 8/30/00
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
F003	Finishing line of 7 spray booths and 1 touchup/repair spray booth	21.1 gals/hr	Spray booths with fiberglass filters or equivalent		4/19/99
Furniture Gluing Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
G006	Upholstery gluing of 2 spray booth stations	2 gals/hr	fabric filters	n/a	none

Insignificant Activities

The following emission units at the facility are identified in the application as being subject to 9 VAC 5-40-80 (visible emissions), 9 VAC 5-40-260 (particulate process weight rate table) or 9 VAC 5-40-20 (minimizing VOC emissions), and are listed as insignificant emission units in 9 VAC 5-80-720 [A, B, and/or C]:

There are no insignificant emission units.

This emission unit is presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Provided, however, that the emission unit identified above shall be subject to monitoring, recordkeeping, and reporting requirements pursuant to 9 VAC 5-80-110 if, in the Director's determination, operation of the emission unit indicates a failure to comply with 9 VAC 5-40-20. The Director shall permit revision proceedings in accordance with 9 VAC 5-80-190 through 9 VAC 5-80-240, as appropriate, to impose specific permit conditions upon such noncomplying emission unit(s).
(9 VAC 5-40-80, 9 VAC 5-40-260, 9 VAC 5-80-110 and 9 VAC 5 Chapter 80 Article 4)

Fuel Burning Conditions - Iron-Fireman 9.8 x 10^6 Btu boiler (B001) and Cleaver Brooks 8.4 x 10^6 boiler (B003)

Limitations

3. Emissions from the operation of each of the Iron-Fireman (B001) and Cleaver Brooks (B003) boilers shall not exceed the limits specified below:

Cleaver Brooks 8.4 x 10^6 boiler (B003)	**Emission Limit (lbs/10^6 Btu)**
Particulate matter	0.6 lbs/10^6 Btu *
PM-10	0.6 lbs/10^6 Btu *
Sulfur Dioxide	2.64 lbs/10^6 Btu *

Iron-Fireman 9.8 x 10^6 Btu boiler (B001)	**Emission Limit (lbs/10^6 Btu)**
Particulate matter	0.6 lbs/10^6 Btu *
PM-10	0.6 lbs/10^6 Btu *
Sulfur Dioxide	2.64 lbs/10^6 Btu *

**** These limits are heat input hourly emission limits.***

(9 VAC 5-40-900, 9 VAC 5-40-930, 9 VAC 5-80-11 H, 9 VAC 5-80-110 B)

4. Visible emissions from the IF (B001) and CB (B003) boiler exhausts shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

(9 VAC 5-50-80, 9 VAC 5-80-110 K)

Monitoring

5. At least one time per week an observation of the presence of visible emissions from the IF and CB (B003) boiler stacks shall be made. The presence of visible emissions shall require the permittee to:

   a. take timely corrective action such that the boiler, with visible emissions, resumes operation with no visible emissions, or,

   b. conduct a visible emission evaluation (VEE) on the boiler, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the boilers are 20 percent opacity or less. If any of the observations exceed the opacity limitation of 20%, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the boiler resumes operation within the 20% opacity limit.

   The permittee shall maintain a IF (B001) boiler stack observation log and a CB (B003) boiler stack observation log to demonstrate compliance. The logs shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, and any necessary corrective action. (9 VAC 5-80-110 E)

Maintenance/Operating Procedures

6. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the IF (B001) and CB (B003) boilers, with respect to air pollution control equipment and process equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

   b. Develop an inspection schedule for the IF (B001) and CB (B003) boilers, annual at a minimum, to insure operational and structural integrity of the boiler and maintain records of inspection results.

   c. Have available written operating procedures for the IF (B001) and CB (B003) boilers. These procedures shall be based on the manufacturer's recommendations, at minimum.

   d . Train operators in the proper operation of the IF (B001) and CB (B003) boilers, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

   (9 VAC 5-80-110 E)

Recordkeeping

7. Emission monitoring for the IF (B001) and CB (B003) boilers, not otherwise required by this permit, shall consist of the following fuel consumption and operating data:

a. The annual consumption of fuel calculated monthly as the sum of each consecutive 12 month period.

b. Records of the opacity observations from the IF (B001) and CB (B003) boilers as required by Condition 5.

c. Records of maintenance, inspections, and training for the IF (B001) and CB (B003) boilers as required by Condition 6.

d. Distillate oil: The permittee shall obtain and maintain records of a certification, or alternative statement, from the fuel supplier covering each shipment of distillate oil. Each fuel supplier certification or alternative statement shall include the following:

i. The name of the fuel supplier
ii. The date on which the oil was received
iii. The amount of distillate oil delivered in the shipment
iv. A statement that the oil complies with the American Society for Testing and Materials (ASTM) specifications for fuel oil numbers 1 and 2
v. The sulfur content of the oil

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-50-50, 9 VAC 5-80-110 F)

Fuel Burning Conditions - Northfab 12.6 x 10^6 Btu boiler (B002)

Emission Control

8. Particulate emissions from the Northfab boiler (B002) shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection.
(9 VAC-50-260, 9 VAC 5-80-110 C; NSR permit dated 10/23/80)

9. Particulate emissions from the transfer of wood to the Northfab boiler (B002) wood fuel storage silo (S005) shall be controlled by a cyclone and fabric filter in series. The cyclone and fabric filter shall be provided with adequate access for inspection.
(9 VAC-50-260, 9 VAC 5-80-110 C; NSR permit dated 10/23/80)

Limitations

10. The approved fuels for the Northfab boiler (B002) are wood and distillate oil, including wood materials generated from the manufacturing processes of sources with SIC 2511. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396 "Standard Specification for Fuel Oils". The permitted facility may switch from one of these approved fuels to another approved fuel without notification. A change to a fuel not listed above may require a permit modification.
(9 VAC-50-260, 9 VAC 5-80-110 B; Condition 6 NSR permit dated 10/23/80)

11. Emissions from the operation of the Northfab boiler (B002) shall not exceed the limits specified below:

Particulate matter	0.36 lbs/10^6 Btu – heat input hourly emission limit	19.9 tons/yr
PM-10	0.36 lbs/10^6 Btu – heat input hourly emission limit	19.9 tons/yr
Sulfur Dioxide	-	28.3 tons/yr

(9 VAC 5-50-260, 9 VAC 5-80-110 B; Conditions 2 & 3 NSR permit dated 10/23/80

12. Visible emissions from the Northfab boiler (B002) exhaust shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-50-80, 9 VAC 5-80-110 K; NSR permit dated 10/23/80)

13. Visible emissions from the wood fuel storage silo fabric filter exhaust shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-50-80, 9 VAC 5-80-110 K; NSR permit dated 10/23/80)

Monitoring

14. At least one time per week an observation of the presence of visible emissions from the Northfab boiler (B002) stack and the wood fuel storage silo fabric filter exhaust shall be made. The presence of visible emissions shall require the permittee to:

    a. take timely corrective action such that the emissions unit, with visible emissions, resumes operation with no visible emissions, or,

    b. conduct a visible emission evaluation (VEE) on the emissions unit, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the are 20 percent opacity or less. If any of the observations exceed the opacity limitation of 20%, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the emissions unit resumes operation within the 20% opacity limit.

    The permittee shall maintain a Northfab boiler (B002) stack observation log and a wood fuel storage silo fabric filter exhaust observation log to demonstrate compliance. The logs shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, and any necessary corrective action.
    (9 VAC 5-80-110 E)

Maintenance/Operating Procedures

15. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Northfab boiler (B002) and wood fuel storage silo, with respect to air pollution control equipment and process equipment which affect such emissions:

    a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Develop an inspection schedule for the Northfab boiler (B002) , annual at a minimum, to insure operational and structural integrity of the Northfab boiler (B002) and multicyclone and maintain records of inspection results.

    c. Develop an inspection schedule for the the wood fuel storage silo cyclone and fabric filter, monthly at a minimum, to insure operational integrity and maintain records of inspection results.

    d. Have available written operating procedures for the Northfab boiler (B002) and multicyclone. These procedures shall be based on the manufacturer's recommendations, at minimum.

    e. Have available written operating procedures for the the wood fuel storage silo cyclone and fabric filter. These procedures shall be based on the manufacturer's recommendations, at minimum.

    f. Train operators in the proper operation of the Northfab boiler (B002) and multicyclone, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

    g. Train operators in the proper operation of the wood fuel storage silo cyclone and fabric filter, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

    (9 VAC 5-80-110 K, 9 VAC 5-80-110 F)

Recordkeeping

16. Emission recordkeeping for the Northfab boiler (B002) and wood fuel silo, not otherwise required by this permit, shall consist of the following fuel consumption and/or operating data:

    a. The annual consumption of wood fuel calculated monthly as the sum of each consecutive 12 month period.

    b. The annual consumption of No. 2 fuel oil calculated monthly as the sum of each consecutive 12 month period.

    c. Records of the opacity observations from the emissions units as required by Condition 14.

    d. Records of maintenance, inspections, and training for the emissions units as required by Condition 15.

e. Distillate oil: The permittee shall obtain and maintain records of a certification, or alternative statement, from the fuel supplier covering each shipment of distillate oil. Each fuel supplier certification or alternative statement shall include the following:

i. The name of the fuel supplier
ii. The date on which the oil was received
iii. The amount of distillate oil delivered in the shipment
ix. A statement that the oil complies with the American Society for Testing and Materials (ASTM) specifications for fuel oil numbers 1 and 2
x. The sulfur content of the oil.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-50-50, 9 VAC 5-80-110 F)

Woodworking Conditions (W004)

Emission Control

17. Particulate emissions from the woodworking dust control systems shall be controlled by fabric filters. The fabric filters shall be provided with adequate access for inspection. Each fabric filter shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order.
(9 VAC 5-50-260, 9 VAC 5-80-110 C; Condition 6 NSR permit dated 4/25/88, amended 3/4/98, and Condition 3 and 4 of the 8/30/00 NSR permit)

Limitations

18. Emissions from the operation of the wood dust collection system shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf	2.8 lbs/hr
PM-10	0.01 gr/dscf	2.8 lbs/hr

(9 VAC 5-50-260 and Condition 5 of the 08/30/00 NSR permit)

19. Visible emissions from the woodworking dust control system fabric filters shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 K, and Condition 6 of the 8/30/00 NSR permit)

20. Visible emissions from any fugitive emission points shall not exceed ten (10) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-260 and Condition 7 of the 8/30/00 NSR permit)

Monitoring

21. At least one time per week an observation of the presence of visible emissions from the woodworking dust control system fabric filter exhaust stacks shall be made. If visible emissions are observed, timely corrective action shall be taken such that the fabric filter resumes operation with no visible emissions. The permittee shall maintain a pollution control device observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, and any necessary corrective action. (9 VAC 5-80-110 E)

Maintenance/Operating Procedures

22. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the woodworking dust control system fabric filters, with respect to air pollution control equipment and process equipment which affect such emissions:

    a Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the fabric filters and maintain records of inspection results.

    c. Have available written operating procedures for the fabric filters. These procedures shall be based on the manufacturer's recommendations, at minimum.

    d. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

    (9 VAC 5-170-160, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F; Condition II.3 NSR permit dated 4/25/88, amended 3/4/98)

Recordkeeping

23. Emission recordkeeping for the woodworking dust control systems, not otherwise required by this permit, shall consist of the following operating data:

    a. Records of the monitoring observations for the fabric filters as required by Condition 19.

    b. Records of maintenance and inspections for the fabric filters as required by Condition 20.

    c. Annual hours of operation of the wood dust collection system, calculated monthly as the sum of each consecutive 12 month period.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-50-50, 9 VAC 5-80-110 F, and Condition 8 of the 8/30/01 NSR Permit)

Finishing Operation Conditions (F003)

Emission Control

24. Particulate emissions from the finishing operation spray booths shall be controlled by fiberglass filters, or equivalent. The finishing operation shall be provided with adequate access for inspection. The spray booths shall be equipped with a device to continuously measure the differential pressure drop across the filters. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-10 H, 9 VAC 5-50-260, 9 VAC 5-80-110 C; Condition 3 NSR permit dated 4/19/99)

Limitations

25. Volatile Organic Compound emissions from the finishing operation spray booths shall be minimized by proper spraying technique, the use of HVLP and air assisted airless spray equipment, and by complying with the Work Practice Standards of 40 CFR 63, Subpart JJ.
(9 VAC 5-170-160, 9 VAC 5-80-110 C; Condition 4 NSR permit dated 4/19/99)

26. Emissions from the operation of the finishing operation spray booths shall not exceed the limits specified below:

Particulate Matter	3.5 lb/hr	8.9 tons/yr
PM-10	3.5 lb/hr	8.9 tons/yr
Volatile Organic Compounds	98.0 lb/hr	230.0 tons/y

(9 VAC 5-50-260, 9 VAC 5-50-180, 9 VAC 5-80-110 B; Condition 6 NSR permit dated 4/19/99)

27. Visible emissions from the finishing operation spray booth exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-170-160 and 9 VAC 5-50-20, 9 VAC 5-80-110 K; Condition 10 NSR permit dated 4/19/99)

28. The finishing operation is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart JJ for a new affected source, including all future revisions.
(9 VAC 5-170-160 of State Regulations, 9 VAC 5-80-110, 40 CFR 63.800 and 40 CFR 63 Subpart A; Condition 11 NSR permit dated 4/19/99)

Monitoring

29. At least one time per week an observation of the presence of visible emissions from the finishing operation spray booth stacks shall be made. If visible emissions are observed, timely corrective action shall be taken such that the spray booths resumes operation with no visible emissions. The permittee shall maintain a spray

booth observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, and any necessary corrective action.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

Maintenance/Operating Procedures

30. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the finishing operation spray booths, with respect to air pollution control equipment and process equipment which affect such emissions:

    a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Have available written operating procedures for the finishing operation spray booths. These procedures shall be based on the manufacturer's recommendations, at minimum.

    c. Train operators in the proper operation of the finishing operation spray booths and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training (training can be the same as that required by MACT JJ).

    d. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

    (9 VAC 5-170-160, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F; Condition 17 & 18 NSR permit dated 4/19/99)

Recordkeeping

31. Emission recordkeeping for the finishing operation not otherwise required by this permit shall consist of the following operating data:

    a. A monthly and annual material balance including the throughput and emissions of VOCs and PM. Annual throughput and emissions shall be calculated monthly as the sum of each consecutive 12 month period. PM emissions shall be based on 50% transfer efficiency and 85% control efficiency.

    b. Records necessary to show compliance with 40 CFR 63, Subpart JJ, including all future revisions.

    c. Records of the monitoring observations for the finishing operation spray booth stacks as required by Condition 27.

    d. Records of maintenance, inspections, and training (training can be the same as that required by MACT JJ) for the finishing operation spray booths as required by Condition 28.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-50-50, 9 VAC 5-80-110 F; Condition 13 NSR permit dated 4/19/99)

Gluing Conditions (G006)

Limitations

32. Visible emissions from the glue spray booth exhausts shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-40-80, 9 VAC 5-80-110 K)

Monitoring

33. At least one time per week an observation of the presence of visible emissions from the glue spray booths exhaust stacks shall be made. If visible emissions are observed:

    a. timely corrective action shall be taken such that the spray booth resumes operation with no visible emissions, or

    b. conduct a visible emission evaluation (VEE) in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the spray booth are 20 percent opacity or less.

    The permittee shall maintain a pollution control device observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, and any necessary corrective action.
    (9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

Maintenance/Operating Procedures

34. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the glue spray booths, with respect to air pollution control equipment and process equipment which affect such emissions:

    a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Have available written operating procedures for the glue spray booths. These procedures shall be based on the manufacturer's recommendations, at minimum.

c. Train operators in the proper operation of the glue spray booths and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

d. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-40-20, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F)

Recordkeeping

35. Emission recordkeeping for the glue spray booths, not otherwise required by this permit, shall consist of the following operating data:

a. Records of the monitoring observations for the glue spray booths stacks as required by Condition 31.

b. Records of maintenance, inspections, and training for the glue spray booths as required by Condition 32.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-40-50, 9 VAC 5-80-110 F)

MACT Conditions

36. The facility is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart JJ, including future revisions (current copy attached). All terms used regarding 40 CFR 63, Subpart JJ shall have the meanings as defined in 40 CFR 63.801 and 40 CFR 63.2.
(9 VAC 5-60-100, 40 CFR 63.800 and 40 CFR 63 Subpart A; Condition 11 NSR permit dated 4/19/99)

Emission Standard

37. Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits:

a. For finishing operations use any of the following methods:

i. Achieve a weighted average VHAP content across all coatings of 0.8 lb VHAP/lb solids, as applied;

ii. Use compliant finishing materials that meet the following specifications:

(1 Each sealer and topcoat has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied;

(2 Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

(3 Each thinner contains no more than 10.0 percent VHAP by weight except where excluded by (5) of this sub-section;

(4 Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied;

(5 Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight;

iii. Use any combination of averaging, compliant coatings, and control device such that no greater than 0.8 lb of VHAP being emitted per lb of solids used;

b. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied;

c. For contact adhesive operations use one of the following methods:

Compliant contact adhesives shall be used based on the following criteria:

(1 For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;

(2 For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids, as applied;

(3 For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids, as applied.

(9 VAC 5-60-100 and 40 CFR 63.802)

Continuous Compliance

38. Continuous compliance with the VHAP emissions limits shall be determined as follows:
(See Condition 42 and 43 for content and timing of report submissions and signature requirements)

a. For finishing operations when averaging is being used to show continuous compliance, the permittee shall submit the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report. The compliance

certification shall state that the value of (E), as calculated by Equation 1, is no greater than 0.8. The facility is in violation of the standard if E is greater than 0.8 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + ... + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + ... \ S_nW_n)/(M_{c1} + M_{c2} + ... + M_{cn})$$

..... Equation 1

E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.
M_c = the mass of solids in a finishing material or coating (c) used monthly, including exempt finishing materials and coatings, lb solids/month.
C_c = the VHAP content of a finishing material or coating (c), in pounds of VHAP per pound of coating solids.
S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials or coatings.
W = the amount of solvent, in pounds, added to finishing materials and coatings during the monthly averaging period.

The Emission Limit (E in lb VHAP / lb solids) equals the sum, for all finishing materials and coatings, of the mass of solids in each material used within that month (M_c in lb solids / month) multiplied by the VHAP content in each material (C_c in lb VHAP / lb solids) plus the sum, for all solvents, of the mass of solvent used monthly (W in lb solvent / month) multiplied by the weight fraction of VHAP in the solvent (S in lb VHAP / lb solvent), with this total being divided by the sum, for all finishing materials and coatings, of the mass of solids in each finishing material and coating used within that month (M_c in lb solids / month).

b. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition 35, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

c. For finishing operations when compliant coatings are being used to show continuous compliance and the coatings are being applied using continuous coaters the permittee shall demonstrate continuous compliance by either of the following:

iii. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, use compliant thinners, and submit a compliance certification with the semiannual report which states that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

iv. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir, use compliant thinners, maintain a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintain records of solvent additions, and submit a compliance certification with the semiannual report which states that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. The facility is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit, as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.

d. For contact adhesive operations when compliant adhesives are being used to show continuous compliance the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

e. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

f. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the Administrator may require the permittee to modify the plan (see Condition 40.a.).

(9 VAC 5-60-100 and 40 CFR 63.804.(g) & 40 CFR 63.8

Testing

38. If compliance testing is conducted the tests shall be conducted using the test methods and procedures as specified in 40 CFR 63.805 of Subpart JJ.
(9 VAC 5-60-100, 40 CFR 63.805)

Submittals

39. All submittals regarding 40 CFR 63, Subpart JJ to the Administrator shall be sent to the West Central Regional Office, and to EPA Region III at the following addresses:

U.S. EPA Region III
Air Protection Division (3AP00)
ATTN: Wood Furniture NESHAP Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029

Virginia Department of Environmental Quality
Director, West Central Regional Office
Attn: Air Compliance Manager
3019 Peters Creek Road
Roanoke, VA 24019

(9 VAC 5-60-100 and 40 CFR 63.13)

Operation and Maintenance

40. The permittee shall meet the following operation and maintenance requirements:

a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

b. Malfunctions shall be corrected as soon as practicable after their occurrence.

c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

d. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(9 VAC 5-60-100 and 40 CFR 63.6(e))

Work Practice Standards

41. The permittee shall develop and implement the following work practice standards:

a. Work practice implementation plan - The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing

operations and addresses each of the work practice standards presented in Conditions b. through l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in '63.803 of Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

b. Operator training course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

i. A list of all current personnel by name and job description that are required to be trained;

ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

c. Inspection and maintenance plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

ii. An inspection schedule;

iii. Methods for documenting the date and results of each inspection and any repairs that were made;

iv. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(1 A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(2 Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

d. Cleaning and washoff solvent accounting system - The permittee shall develop an organic HAP solvent accounting form to record:

i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in '63.801 of Subpart JJ;

ii. The number of pieces washed off, and the reason for the washoff; and

iii. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

e. Chemical composition of cleaning and washoff solvents - The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ (see attached), in concentrations subject to MSDS reporting as required by OSHA.

f. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

g. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

h. Application equipment requirements - The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

ii. For touchup and repair under the following conditions:

(1 The touchup and repair occurs after completion of the finishing operation; or

(2 The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

iii. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

iv. When emissions from the finishing application station are directed to a control device;

v. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

vi. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasiblity by submitting to the Administrator a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasiblity. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasiblity:

(1 The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(2 The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

i. Line cleaning - The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

j. Gun cleaning - The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

k. Washoff operations - The permittee shall control emissions from washoff operations by:

i. Using normally closed tanks for washoff; and

ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

l. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

i. Identifies VHAP from the list presented in Table 5 of Subpart JJ (see attached) that are being used in finishing operations;

ii. Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by '63.803 (l)(2).

For VHAPs that do not have a baseline, one will be established according to Condition vi. below.

iii. Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.

iv. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the West Central Regional Office and the Administrator that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(1 The exceedance is no more than 15.0 percent above the baseline level;

(2 Usage of the VHAP is below the de minimis level presented in Table 5 for that VHAP;

(3 The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(4 The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.

v. If none of the explanations listed in Condition iv. above are the reason for the increase, the permittee shall confer with the West Central Regional Office and/or the Administrator to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the West Central Regional Office and/or the Administrator and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

vi. If the facility uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the West Central Regional Office and/or the Administrator that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Condition iv. above, the affected source shall follow the procedures established in Condition v. above.

(9 VAC 5-60-100 and 40 CFR 63.803(a)-(l))

Recordkeeping

42. The permittee shall maintain records of the following:

a. For emission limit purposes the permittee shall maintain the following:

i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Subpart JJ;

ii. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Subpart JJ; and

iii. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Subpart JJ.

b. Following the averaging method the permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.

c. Following the continuous coating operations, where viscosity is being used to determine compliance, the permittee shall maintain the records required by Condition a above as well as the following:

i. Solvent and coating additions to the continuous coater reservoir;

ii. Viscosity measurements; and

iii. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.

d. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

i. Records demonstrating that the operator training program required by Condition 40.b. is in place;

ii. Records collected in accordance with the inspection and maintenance plan required by Condition 40.c.;

iii. Records associated with the cleaning solvent accounting system required by Condition 40.d.;

iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by Condition 40.h.;

v. Records associated with the formulation assessment plan required by Condition 40.l.; and

vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

e. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.

f. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.

g. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-60-100 and 40 CFR 63.806 & 63.10(b)(1))

Notification of Compliance

43. Each time a notification of compliance status is required , the permittee shall submit to the West Central Regional Office and the Administrator a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with Subpart JJ. The notification shall list:

a. The methods that were used to determine compliance;

b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;

e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);

f. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

g. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

(9 VAC 5-60-100 and 40 CFR 63.9(h))

Reporting

44. Reporting not otherwise required by this permit shall consist of the following:

a. The permittee when demonstrating continuous compliance shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

i. Reports shall be submitted no later than March 1 and September 1 of each calendar year.

ii. The semiannual reports shall include the information required by Condition 36, a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

iii. The frequency of the reports required by Condition a. above shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

b. The permittee, when required to provide a written notification by Condition 40.l.iv. for exceedance of a baseline level, shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

Copies of the reports shall be submitted to the U.S. Environmental Protection Agency and Virginia Department of Environmental Quality at the addresses given in Condition #38.

(9 VAC 5-60-100 and 40 CFR 63.807 & 63.10(d))

Other Conditions

Visible Emission Standard

45. Unless otherwise specified in this permit, visible emissions from the any emission unit at the Sam Moore facility shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-40-80, 9 VAC 5-80-110 A)

46. Unless otherwise specified in this permit, visible emissions from the any emission unit at the Bedford Manufacturing facility shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

(9 VAC 5-50-80, 9 VAC 5-80-110 A)

Fugitive Dust/Emission Standard

47. During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.
(9 VAC 5-40-90, 9 VAC 5-50-90, 9 VAC 5-80-110 A)

Emission Tests

48. Upon request of the Department, the permittee shall conduct emission tests in accordance with procedures approved by the Department and provide, or cause to be provided, emission testing facilities as follows:

- Sampling ports adequate for test methods applicable to such source.
- Safe sampling platforms.
- Safe access to sampling platforms.
- Utilities for sampling and testing equipment.

(9 VAC 5-40-30 F, 9 VAC 5-50-30 F)

General Conditions

Circumvention

49. No owner or other person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air pollutants emitted, conceals or dilutes an emission of

air pollutants which would otherwise violate State Regulations. Such concealment includes, but is not limited to, 1) the use of gaseous diluents to achieve compliance with a visible emissions standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere, or 2) the piecemeal carrying-out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size. This section does not prohibit the construction of a stack.
(9 VAC 5-20-70)

Good Air Pollution Control Practice

50. To the extent practicable, the permittee shall at all times, including periods of start-up, shutdown and malfunction, maintain and operate the source including associated air pollution control equipment, if any, in a manner consistent with good air pollution control practice for minimizing emissions.
Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
Excess emissions shall be reported and records maintained in accordance with the provisions of 9 VAC 5-20-180.

(9 VAC 5-20-180, 9 VAC 5-40-20, 9 VAC 5-50-20).

Duty to Supplement or Correct Application

51. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. An applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E and 9 VAC 5-80-110 M)

Submissions Certification

52. Any application form, report, compliance certification, or other document required to be submitted to the DEQ shall be signed by a responsible official.
(9 VAC 5-80-80 G and 9 VAC 5-80-110 K)

Permit Duration and Application Shield

53. This permit shall become invalid five years from the date of issuance, which is noted on Page 1 of this permit. The permittee shall submit an application for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.
(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

Monitoring - Recordkeeping and Reporting

54. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

a. The date, place as defined in the permit, and time of sampling or measurements.

b. The date(s) analyses were performed.

c. The company or entity that performed the analyses.

d. The analytical techniques or methods used.

e. The results of such analyses.

f. The operating conditions existing at the time of sampling or measurement.

Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

The permittee shall submit the results of monitoring, including periodic monitoring, contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. The time period to be covered in the report is specified below. Each report must be postmarked within 30 days following each six-month reporting period. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

b. All deviations from permit requirements, as reported in accordance with Condition 54.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual period."

d. These Title V semi-annual reports shall be sent to the following address:

Virginia Department of Environmental Quality
Director, West Central Regional Office
ATTN: Air Compliance Manager
3019 Peters Creek Road
Roanoke, VA 24019

(9 VAC 5-80-110 F)

Permit Deviation Reporting

55. The permittee shall notify the West Central Regional Office, within four daytime business hours of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the occurrence, the permittee shall provide a written statement explaining the problem, any corrective actions or preventive measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 53 .
(9 VAC 5-80-110 F.2., 9 VAC 5-80-250)

Severability

56. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G)

Duty to Comply

57. The permittee shall comply with all conditions of the permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
(9 VAC 5-80-110 G and 9 VAC 5-80-260 A)

Need to Halt or Reduce Activity Not a Defense

58. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G)

Permit Action for Cause

59. The permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

a. This permit will be reopened and revised by the DEQ prior to expiration due to the following causes:

i. If additional applicable federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire.

ii. If the Board or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. If the Administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

iv. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date of this permit.

b. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

c. Reopenings shall not be initiated before a notice of such intent is provided to the source by the Board at least 30 days in advance of the date that the permit is to be reopened, except that the Board may provide a shorter time period in the case of an emergency.

d. If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit pursuant to 9 VAC 5-80-240 A, the Administrator shall notify the Board and the permittee of such finding in writing. Following such notification the procedures as listed in 9 VAC 5-80-240 D shall be followed.

e. A permit may be revoked or terminated prior to its expiration date if the owner does any of the following:

i. Knowingly makes material misstatements in the permit application or any amendments thereto.

ii. Violates, fails, neglects or refuses to comply with (i) the terms or conditions of the permit, (ii) any applicable requirements, or (iii) the applicable provisions of 9 VAC 5 Chapter 80 Article 1.

The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination stated above for any other violations of the regulations.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260)

Property Rights

60. The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G)

Duty to Submit Information

61. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

(9 VAC 5-80-110 G)

Duty to Pay Permit Fees

62. The permittee shall pay a permit fee as established in 9 VAC 5-80-330 of the State Regulations. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the department.
(9 VAC 5-80-110 H, 9 VAC 5-80-340 C)

Emissions Trading

63. No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit.
(9 VAC 5-80-110 I)

Inspection and Entry Requirements

64. Upon presentation of credentials and other documents as may be required by law, the owner shall allow the Board to perform the following:

a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K, 9 VAC 5-80-260 E, and 9 VAC 5-170-130)

Annual Compliance Certification

65. The permittee shall submit a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices. The time period to be covered by the certification is the calendar months January 1 to December 31. Each report must be postmarked within 30 days following each annual period.

a. The compliance certification shall include the following:

i. The permit term or condition that is the basis of the certification;

ii. The current compliance status;

iii. Whether compliance was continuous or intermittent;

iv. The methods used for determining compliance, currently and over the reporting period; and

v. Such other facts as the Board may require to determine the compliance status of the source.

b. All compliance certifications shall be submitted to the West Central Regional Office, and to EPA Region III at the following address:

Clean Air Act Title V Compliance Certifications (3AP00)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

c. Such additional requirements as may be specified pursuant to ' 114(a)(3) and ' 504(b) of the federal Clean Air Act.

(9 VAC 5-80-110 K)

Federal Enforceability

66. All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the federal Clean Air Act.
(9 VAC 5-80-110 N)

Permit Shield

67. The permit shield provides that:

a. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements in effect as of the date of permit issuance and as specifically identified in the permit. The permit shield shall cover the applicable requirements that are covered by terms and conditions of the permit, and

b. Nothing in 9 VAC 5-80-140 or in this permit shall alter or affect the following:

i. The provisions of ' 303 of the federal Clean Air Act (emergency orders), including the authority of the Administrator under that section.

ii. The liability of an owner for any violation of applicable requirements prior to or at the time of permit issuance.

iii. The ability to obtain information from a source by the (1) Administrator pursuant to ' 114 of the federal Clean Air Act (inspections, monitoring, and entry); (2) Board pursuant to ' 10.1-1314

or ' 10.1-1315 of the Virginia Air Pollution Control Law; or (3) department pursuant to ' 10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

Transfer of Permit

68. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

Changes to Permit

69. Changes to emissions units that pertain to applicable federal requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 B through D and 9 VAC 5-80-200 through 9 VAC 5-80-240. Changes to emissions units that pertain to applicable state requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 E.
(9 VAC 5-80-190 A)

Malfunction as an affirmative defense

70. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

b. The permitted facility was at the time being properly operated.

c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

d. For malfunctions that occurred for one hour or more, the permittee submitted to the Board a notice and written statement containing a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notice and statement met the time requirements for submittal as follows:

i. The notice of the malfunction was submitted by facsimile transmission, telephone or telegraph as soon as practicable but no later than four daytime business hours of the time when the emission limitations were exceeded due to the malfunction.

ii. The written statement describing the malfunction was submitted no later than two weeks following the day the malfunction occurred.

The notice fulfills the requirement of 9 VAC 5-80-110 F b 2 to report promptly deviations from permit requirements.

In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250 and 9 VAC 5-20-180 C)

Permit on Site

71. Within five days after receipt of the issued permit, the applicant shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to the Board upon request. (9 VAC 5-80-150 E)